

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and environment of the people of Colorado

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Ray Remy
Governor
Patricia A. Nolan Miller
Executive Director

October 22, 1992



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Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office, Bldg 116
P.O. Box 928
Golden, Colorado 80402-0928

RE: Water Management IM/IRA for A-series Ponds, B-series Ponds, Pond C-2, and the Landfill Pond

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), and the Environmental Protection Agency (EPA) hereby request that DOE, pursuant to Paragraph 150 of the IAG, develop and implement an Interim Measure/Interim Remedial Action (IM/IRA) for the A-series ponds, the B-series ponds, Pond C-2, and the Landfill Pond addressing at least the following items:

- 1) Control of pollutant discharges from these ponds,
- 2) Compliance of pond releases with applicable state and federal standards,
- 3) Development and implementation of an alternative means of water management obviating the need for:
 - spill containment in the ponds,
 - water treatment in the ponds,
 - water transfer between ponds, and
 - spray evaporation of pond water,
- 4) Coordination of pond use with RFI/RI activities while replacement of the ponds is planned and implemented,
- 5) Development of a schedule for implementation of acceptable facilities to replace the ponds anticipating pond cleanup as part of OUs 5, 6, and 7,
- 6) Coordination with future NPDES compliance requirements.

EPA notified DOE on June 26, 1992 (Jack McGraw to James Hartman) that the terminal ponds would no longer be authorized as NPDES discharge points, but control of and releases from the ponds would

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instead be regulated by CERCLA and RCRA under the IAG. Further, EPA stated that the continued use of any ponds for the routine containment of spills is unacceptable. In addition, the Division has recently put DOE on notice that future spray evaporation and water transfer between ponds will require a hazardous waste determination of the affected water (Gary Baughman to Frazer Lockhart, 10/14/92). On top of these items, the Colorado Department of Health, Water Quality Control Commission is conducting hearings on the current and future water quality standards for Segment 5 of Walnut Creek. Segment 5 includes all the ponds considered in this IM/IRA except the Landfill Pond. Therefore, although this IM/IRA was precipitated by the change in the NPDES compliance requirements, other relevant actions are taking place which reinforce the need for implementation of a water management IM/IRA for the ponds.

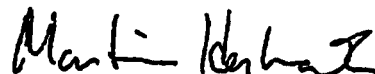
For these and other reasons in the June 26, 1992 letter, EPA strongly urged DOE to initiate scoping activities for an IM/IRA. Since no DOE initiated action has taken place to date, the agencies now request and require that IM/IRA scoping and development commence immediately.

If you have any questions regarding these matters, please call Joe Schieffelin (CDH) at 692-3356, Harlen Ainscough (CDH) at 692-3337 or Bill Fraser (EPA) at 294-1081.

Sincerely,



Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program



Martin Hestmark, Manager
Rocky Flats Team
Environmental Protection
Agency

cc: Daniel S. Miller, AGO
Nettie Corrigan, AGO
James K. Hartman, DOE
Mark Van Der Puy, DOE
Mike Arndt, EG&G
Judy Bruch, CDH-WQCD
Jackie Berardini, CDH-OE
Bob Shankland, EPA
Bonnie Lavelle, EPA